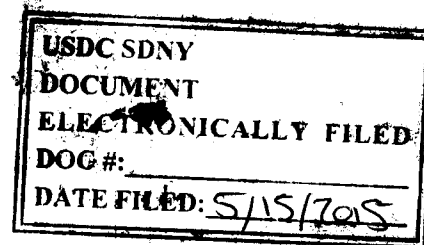


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May 15, 2015

So ordered.

BY ECF AND FAX

Honorable Alvin K. Hellerstein
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Saavedra*, No. 11 Civ. 6425 (AKH)

5/15/2015

Dear Judge Hellerstein:

We write on behalf of Mr. Alex Saavedra to respectfully request that the time for the parties in the above-referenced matter to submit a joint letter regarding penalties pursuant to 31 U.S.C. § 3729(a) be extended until Wednesday, May 20, 2015, at 4:00 p.m. As the Government explained in its letter dated May 7, 2015, the parties conducted discussions regarding the possibility of jointly submitting one proposal for the penalty amount and those discussions continued until yesterday, May 14th. The parties will submit a joint letter which will set forth each party's respective position. Counsel for Mr. Saavedra received the government's letter containing its position this afternoon and will require until Tuesday to draft and send our written position to the government. The government will finalize the joint letter for submission and filing on Wednesday, May 20, 2015 at 4:00. This is the first request by the Defendant for an extension of time to file the joint letter submission. The Government consents to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,

Bettina Schein

Cc: By ECF and Email
AUSA Carina Schoenberger
AUSA Ellen Blain